

MATTHEW W. GRIMSHAW, SBN 210424  
GRIMSHAW LAW GROUP, P.C.  
130 Newport Center Drive, Ste. 140  
Newport Beach, California 92660  
Tel: (949) 734-0187  
Email: matt@grimshawlawgroup.com

BILL ROBINS III, SBN 296101  
ROBERT T. BRYSON, SBN 156953  
KEVIN POLLACK, SBN 272786  
ROBINS CLOUD LLP  
808 Wilshire Blvd., Ste. 450  
Santa Monica, CA 90401  
Tel: (310) 929-4200  
Email: rbryson@robinscloud.com

Attorneys for Robert O'Brien individually and as  
*guardian ad litem* for McKenna O'Brien and Kinsey  
O'Brien; Mary Ellsworth; and Joshua Ellsworth

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re	) Case No. 19-30088 (DM)
PG&E CORPORATION,	)
	) Chapter 11
and	)
PACIFIC GAS AND ELECTRIC	) (Lead Case—Jointly Administered)
COMPANY	)
Debtors	) <b>Notice of Motion to Amend Proof of</b>
	) <b>Claim No. 28994 Filed by Robert</b>
	) <b>O'Brien, or Alternatively, for the</b>
Affects:	) <b>Allowance of a Late-Filed Claim</b>
<input type="checkbox"/> PG&E Corporation	)
<input type="checkbox"/> Pacific Gas & Electric Company	) Date: February 24, 2021
<input checked="" type="checkbox"/> Both Debtors	) Time: 10:00 a.m. (Pacific)
	) Place: Telephonic/Video Appearance Only
	) United States Bankruptcy
* All papers shall be filed in the Lead	) Courtroom 17,
Case, No. 19-30088 (DM).	) 450 Golden Gate Ave., 16th Floor
	) San Francisco, CA 94102
	)
	) Objection Deadline: February 17, 2021

1           **PLEASE TAKE NOTICE** that on January 30, 2021, as Dk. No. 10058, Robert O'Brien  
2 individually and as *guardian ad litem* for McKenna O'Brien and Kinsey O'Brien; Mary Ellsworth;  
3 and Joshua Ellsworth (collectively, "Movants") filed a motion to amend Proof of Claim Nos. 28994  
4 ("Claim") or, alternatively, for the allowance of a late-filed claim arising from damage caused by the  
5 2017 North Bay Fire ("Motion").

6           **PLEASE TAKE FURTHER NOTICE** that a telephonic hearing on the Motion will held on  
7 February 24, 2021, at 10:00 a.m. (Pacific Time) in the Courtroom of the Honorable Dennis Montali,  
8 United States Bankruptcy Judge, Courtroom 17, 16<sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco,  
9 CA 91402.

10          **PLEASE TAKE FURTHER NOTICE** that all interested parties should consult the  
11 Bankruptcy Court's website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during  
12 the COVID-19 pandemic. The Bankruptcy Court's website provides information regarding how to  
13 arrange a telephonic or video appearance. If you have any questions regarding how to appear at a  
14 court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live  
15 Chat feature on the Bankruptcy Court's website.

16          **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must  
17 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Movants at the  
18 above-referenced addresses so as to be received by the time set by the Bankruptcy Court. Any  
19 oppositions or responses must also be filed and served on all "Standard Parties" as defined in, and in  
20 accordance with, the Second Amended Order Implementing Certain Notice and Case Management  
21 Procedures entered on May 14, 2019 (EFC No. 1996) ("Case Management Order"). Any relief  
22 requested in the Motion may be granted without a hearing if no opposition is timely filed and served  
23 in accordance with the Case Management Order. In deciding the Motion, the Court may consider any  
24 other document filed in these Chapter 11 Cases and related adversary proceedings.

25          **PLEASE TAKE FURTHER NOTICE THAT** that copies of the Motion and its supporting  
26 papers can be viewed and/or obtained: (i) by accessing the Court's website at  
27 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
28 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime

1 Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for  
2 U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:  
3 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com).

4 Note that a PACER password is needed to access documents on the Bankruptcy Court's  
5 website.

6 Respectfully submitted,

7 Dated: January 29, 2021

GRIMSHAW LAW GROUP, P.C.



9 By: \_\_\_\_\_  
10 MATTHEW W. GRIMSHAW

11 Dated: January 29, 2021

ROBINS CLOUD LLP



13 By: \_\_\_\_\_  
14 ROBERT T. BRYSON

15 Attorneys for Robert O'Brien individually and  
16 as *guardian ad litem* for McKenna O'Brien and  
17 Kinsey O'Brien; Mary Ellsworth; and Joshua  
18 Ellsworth